

Weisberg Law

Attorneys & Counselors at Law

LICENSED IN PA & NJ

7 SOUTH MORTON AVENUE
MORTON, PENNSYLVANIA 19070

PH: 610.690.0801

FAX: 610.690.0880

Additional Offices

Philadelphia, Pa

Bala Cynwyd, Pa

*Matthew B. Weisberg**^

L. Anthony DiJiacomo~

David A. Berlin^

Robert P. Cocco~+

Gary Schafkopf^+

Brian Mildenberg~+

Marc Weisberg~+

Yanna Panagopoulos~+

*NJ & PA Office Manager

^Licensed in PA & NJ

~Licensed in PA

+Of Counsel

Web-Site: www.weisberglawoffices.com

E-Mail: MWEISBERG@WEISBERGLAWOFFICES.COM

Thursday, October 26, 2017

Via ECF

The Honorable Juan R. Sanchez

RE: Giddings v. Brown & Brown General Contractors, Inc., et al.
No.: 16-4917

Your Honor:

Pending before this Honorable Court in the above-captioned action is this Court's October 30, 2017 hearing upon plaintiff's Motion for Entry of Final Judgment. The undersigned is co-counsel to plaintiff along with lead trial counsel, Gary Schafkopf, Esquire.

Unfortunately, Counsel's office inadvertently juxtaposed service of this process (i.e., personal service) with service of subsequent process (i.e., mailing) – without excuse but by way of explanation, given Defendants have already been twice personally served prior. Counsel takes personal responsibility and apologizes.

Counsel has “rush” sent a process server today for personal service (at counsel's personal expense).

Previously, Counsel's office has sent this Honorable Court's Order on unrepresented defendant by regular and certified mail. Unfortunately, Defendant is (again) evading certified mail delivery: (1) no authorized person present on first attempt on October 19, 2017 – notice left at residence by USPS; and (2) re-delivery attempt by USPS scheduled for today, October 26, 2017.

Plaintiff respectfully inquires as to whether these attempts (including twice prior personal service; Order left at residence; and motion previously mailed) are substantially sufficient to

abide this Court's service Order? If not, plaintiff respectfully requests an adjournment of the above-referenced hearing.

Plaintiff thanks this Honorable Court for its guidance or, alternatively, consideration of this request for a hearing adjournment. Of course, plaintiff and all counsel will abide this Honorable Court's directive.

Sincerely,

/s/ Matthew B. Weisberg
MATTHEW B. WEISBERG

MBW/hcm

Cc: Brown & Brown General Contractors, Inc.
3 Mock Drive
Wilmington, DE 19810
(via FedEx overnight mail)

Joel Brown
3 Mock Drive
Wilmington, DE 19810
(via FedEx overnight mail)